

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

IN RE: CORWIN PLACE LLC
Debtor

BK NO. 16-00750

**TRUSTEE'S MOTION FOR COMPLETE REPORT
UNDER RULE 1019 OF THE BANKRUPTCY RULES OF PROCEDURE**

Now comes the trustee, Martin P. Sheehan, by his attorneys, Martin P. Sheehan and SHEEHAN & NUGENT, and moves the Court for an order requiring CORWIN PLACE LLC to provide a complete report under Rule 1019 of the Bankruptcy Rules of Procedure prior to the meeting of creditors, detailing the following information:

Part I

Column 1 should list all assets on the original petition.

Column 2 should list the value of each asset in the petition for all assets in column 1.

Column 3 should list the amount of secured debt against each asset (if any). Appropriate notations should be made for multiple assets secured by a single lien, multiple liens against the same asset and cross-collateralized liens.

Column 4 should indicate if the property is a) still owned; b) sold in 11; c) abandoned in 11; d) other (with specificity). If assets are at multiple locations, location information should be provided.

Column 5 should list the value at conversion of assets (particularly for cash, bank accounts, inventory and accounts receivable).

Accounts Receivable

Accounts receivable should list in the report, or by separate attachment, the person owing, the address, the amount, and whether there have been any disputes. Ideally, some collection history for ongoing accounts will be provided.

Part II

A list of all assets not originally listed, and information similar to that sought in Part I; plus, a column identifying origin (unscheduled, purchased, traded for, etc..)

Part III

A list of the Chapter 11 creditors addresses and amounts owed. For employee creditors, Social Security number, and any existing wage attachments, child support orders, etc. should be provided.

Part IV

Copies of all tax returns and any other reports required to be filed during the Chapter 11, and for two pre-petition filing periods; copies of all executory contracts.

Part V

Identification of any preference or fraudulent transfers that might be actionable. Any other lawsuits, or potential lawsuits.

Part VI

Any other item the trustee needs to know, (pollution problems, pending criminal investigations, lawsuit deadlines).

RESPECTFULLY SUBMITTED

/s/ Martin P. Sheehan

Martin P. Sheehan

Trustee

WV Bar No. 4812

SHEEHAN & NUGENT, PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Deb Wertman
debra.a.wertman@usdoj.gov

David Lucas Fuchs
dfuchs@lampllaw.com

RESPECTFULLY SUBMITTED

/s/ Martin P. Sheehan
Martin P. Sheehan, Esq.

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